

THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

FILED

AUG 12 2025

JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY , DEPUTY

VANCE DOTSON
Plaintiff,

v.

EXPERIAN INFORMATION
SOLUTIONS, INC.,
Defendants.

)
) JURY TRIAL DEMANDED
)
) Case No.
) 25-CV-00605-SLP
)
)
)
)

PLAINTIFF'S DECLARATION OF VANCE DOTSON IN SUPPORT OF
PLAINTIFFS OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

I, Vance Dotson, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct based on my personal knowledge:

1. I am the Plaintiff in this action, proceeding pro se, and I am over the age of 18 and competent to make this declaration. I reside at 425 W. Wilshire Blvd., Suite E, Oklahoma City, Oklahoma 73116.
2. I make this declaration in support of my Opposition to Defendant Experian Information Solutions, Inc.'s ("Experian") Motion to Dismiss my Amended Complaint. The facts stated herein are true to the best of my knowledge and belief, and if called as a witness, I could competently testify thereto.
3. On or about February 6, 2025, I requested and obtained my consumer credit disclosure from Experian through www.annualcreditreport.com. A true and correct copy of this disclosure is attached to the Amended Complaint as Exhibit 1.

4. Upon reviewing the disclosure, I discovered that it omitted critical trended data, including historical payment and balance information over a 24-month period, such as actual payment amounts, scheduled payment amounts, balance trends, and incomplete payment histories for multiple accounts. This trended data is essential for assessing my creditworthiness, as it shows patterns like consistent payments exceeding minimums and reductions in credit utilization. The omissions made my credit profile appear incomplete and inaccurate, potentially misleading lenders.
5. Specific examples of incomplete and inaccurate trended data include:
 - For my American Express account (ending in 0473): Missing monthly payments, credit limits, and payment history details.
 - For my Citi Cards/CitiBank account (ending in XXXX): Incomplete account number, terms, monthly payments, and payment history, including missing scheduled and actual payments for months like February 2025 and October 2022.
 - Similar omissions existed for accounts with Bank of America, BMW Financial Services, CBNA, CCS/First National Bank, CCS/First Savings Bank, Celtic Bank/Contfinco, Communication FCU, Cortrust Bank, Discover Bank, JPMCB Card (multiple accounts), Navy Federal Credit Union, and Tinker FCU, as detailed in paragraphs 53-98 of the Amended Complaint.
6. On or about February 8, 2025, I disputed these inaccuracies and incompleteness with Experian pursuant to 15 U.S.C. § 1681i, providing a detailed dispute letter outlining the omitted trended data and attaching supporting evidence, i.e. the actual report received from annual credit report dot com which was the February 6, 2025 disclosure. A true and correct copy of my dispute letter is attached to the Amended Complaint as Exhibit 4. Experian failed to reasonably reinvestigate, as the inaccuracies remained uncorrected in subsequent reports, and Experian did not contact furnishers or review all provided information adequately. Experian's reinvestigation results, dated March 17, 2025, did not address or fix the issues. A true and correct copy is attached to the Amended Complaint as Exhibit 2.

7. Experian's failure to ensure accuracy under 15 U.S.C. § 1681e(b), disclose all file information under 15 U.S.C. § 1681g(a)(1), and reinvestigate under 15 U.S.C. § 1681i(a) has caused me concrete harm. I have suffered emotional distress, including anxiety and frustration requiring ongoing counseling through www.BetterHelp.com at \$65 per week since on or about May 20, 2025. True and correct copies of counseling receipts are attached to the Amended Complaint as Exhibit 5. These harms are directly traceable to the misleading incompleteness in my trended data, which distorts my positive credit behavior.
8. I have reviewed Experian's own website (<https://www.experian.com/business/solutions/advanced-analytics/trended-data>, last visited July 28, 2025), which confirms that trended data provides "greater insights into customers to better determine their creditworthiness" and improves scoring models. Despite this, Experian omitted this data from my disclosure and failed to correct it after my dispute.
9. The facts alleged in my Amended Complaint are true and accurate based on my personal experiences and records.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 12, 2025, at Oklahoma City, Oklahoma.



Vance Dotson

425 W. Wilshire Blvd., Suite E
Oklahoma City, Oklahoma 73116
(405) 406-7323
vancedotson@yahoo.com

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2025, I caused the foregoing document to be filed with the Clerk of Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record:

Jimmy Goodman
Crowe & Dunlevy
Braniff Building
324 North Robinson Ave., Ste. 100
Oklahoma City, Oklahoma 73102
jimmy.goodman@crowedunlevy.com

/s/ Vance Dotson

A handwritten signature in black ink that reads "Vance Dotson". The signature is written in a cursive, flowing style with a large initial "V" and a stylized "D".